

## Remarks

Claims 1-60 remain pending. Entry of the amendment entry is respectfully requested. No new matter has been added. Reconsideration is respectfully requested.

## Claim Status

Claims 1-58 were rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement.

Claims 1-13, 35-38, and 59-60 were rejected under 35 U.S.C. § 102(b) as being anticipated by Brannan (US 5,879,092).

Claims 14-34 and 39-58 were rejected under 35 U.S.C. § 103(a) as obvious over Brannan and Coutts (US 6,311,165).

## The 35 U.S.C. § 112, first paragraph, rejections

As best understood, the rejection is a "new matter" type of rejection. Thus, the rejection is unclear as the claims were part of the originally filed application. Note MPEP § 2163.06(III).

Furthermore, the Office indicates that the disclosure of U.S. Patent 5,879,092 (Brannan) supports the claims. Yet this same Patent disclosure is part of Applicants' specification (e.g., incorporated by reference at page 39, line 21). Note MPEP § 2163.07(b). Applicants respectfully submit that the 35 U.S.C. § 112, first paragraph, rejections should be withdrawn.

Applicants respectfully submit that their disclosure provides ample support for the claimed subject matter. For example, with regard to claim 1, the disclosure discusses several exemplary arrangements of moving devices with regard to (1) the inability of paper to be moved by a first paper moving device despite operation of a second paper moving device, and (2) the ability of the paper to be moved by the first paper moving device despite non operation of the second paper moving device.

Some examples of relationships between first and second paper moving devices can be found at specification page 14, line 14 to page 15, line 3; page 21, lines 8-21; and original claim 26. Other examples of relationships between first and second paper moving devices can be found at specification page 31, lines 16-19 and original claim 33; and also specification page 32, lines 1-5 and original claim 32. Note the disclosure for further examples of these relationships.

As Applicants' specification provides proper support, it is respectfully requested that the 35 U.S.C. § 112, first paragraph, rejections be withdrawn.

#### **The 35 U.S.C. § 102(b) rejections**

Brannan does not anticipate the claims. The rejections rely on Brannan at col. 7, lines 18-65 for teaching a first paper moving device (paper supply roll 16) and a second paper moving device (take-up roll 18). However, where does Brannan teach that the paper supply roll (16) *moves* paper? Where does Brannan teach that the paper supply roll (16) has a drive? Rather, Brannan teaches that the printer drive (20) pulls paper from the supply roll, which causes the paper supply roll (16) to rotate (col. 7, lines 14-17 and 60-62; col. 9, lines 55-59). Thus, Brannan's paper supply roll (16) cannot constitute a (first or second) paper moving device.

Brannan also does not teach the recited relationship of first and second paper moving devices, especially with regard to fault signal generation. For example, Brannan does not teach generating a fault signal in response to detecting an ability of paper to be moved by a first paper moving device despite non operation of a second paper moving device. Nor does Brannan teach generating a fault signal in response to detecting an inability of the paper to be moved by the first paper moving device despite operation of the second paper moving device.

For reasons of brevity the Applicants have not necessarily presented all of the reasons as to why Brannan does not anticipate the claims. Nevertheless, Applicants' remarks are sufficient to show that Brannan does not teach every feature and relationship arranged in the manner recited in the claims, as is required to sustain the rejections. Applicants reserve the right to later present even more reasons negating the allegation of anticipation.

### **The Dependent Claims**

Coutts cannot alleviate the noted deficiencies in the rejections based on Brannan. The independent claims have been shown to be allowable. Each of the dependent claims depends from an independent claim. Thus, it is asserted that the dependent claims are allowable on the same basis.

Furthermore, each of the dependent claims recites additional specific features and relationships that further patentably distinguish the claimed invention over the applied art. Thus, it is respectfully submitted that the dependent claims are further allowable due to the recitation of such additional features and relationships.

### **Conclusion**

Applicants respectfully submit that this application is in condition for allowance. The undersigned is willing to discuss any aspect of the Application by phone.

Respectfully submitted,



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